UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK



FEDERAL INSURANCE COMPANY a/s/o AAA MID-ATLANTIC, INC.,



Index No. 601997/07

Plaintiffs,

Against,

NOTICE TO ADVERSE PARTY OF NOTICE OF REMOVAL

AMERICAN HOME ASSURANCE COMPANY and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.,

Defendants.

X

TO: Judith Goodman, Esq. Goodman and Jacobs LLP 75 Broad Street New York, NY 10004

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PLEASE TAKE NOTICE that Defendants, AMERICAN HOME ASSURANCE COMPANY ("AHA") and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA ("National Union"; collectively "Defendants"), in this action filed in the Supreme Court of the State of New York, County of New York, have filed a Notice of Removal to the United States District Court for the Southern District of New York on the 16th day of July, 2007, pursuant to 28 U.S.C. § 1441.

{00312763; 1}

A complete copy of the Notice of Removal is attached hereto.

Dated: Florham Park, New Jersey July 13, 2007

Respectfully submitted,

SCHWARTZ SIMON EDELSTEIN CELSO & KESSLER, LLC Attorneys for Defendants

American Home Assurance Company and National Union Fire Insurance Company of Pittsburgh, PA

Bv:

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